

**Case No. 20-20245**

**United States of America**

**Plaintiff,**

**v.**

**Joseph Gregory DuMouchelle**

**Defendant.**

**Defendants Motion to Stay  
Stipulation and Order  
Regarding Late Filing  
of Sentencing Memorandum**

July 22, 2022

Honorable Judge Mark A. Goldsmith  
United States District Court Judge  
231 W. Lafayette, Room 853  
Detroit, MI. 48226

Dear Judge Goldsmith,

It has come to my attention that a motion was filed with the court by Gerald Gleeson II late yesterday afternoon in the form of a stipulation seeking the allowance of a late filing of the sentencing memorandum and that an order has been granted.

As the court knows I have two pending motions that remain unresolved. They are listed below and paraphrased.

1. A motion to replace Mr. Gleeson as defense counsel for Ineffectiveness of counsel for the reasons submitted, listed and stated during the hearing held Monday, July 18, 2022
2. A motion to withdraw my plea, begin again, and with the counsel of my choice. This motion is brought for, but not limited to, the following reasons:
  1. Because of Mr. Epstein's ineffectiveness of counsel and incompetence he lead me down the wrong path, gave me misinformation and guidance and I was manipulated and threatened.
  2. Ineffectiveness of counsel yet again with Mr. Gleeson although at a much higher and more egregious level. I have experienced yet again more manipulation and threats as well on numerous occasions.
  3. Throughout this entire process I have been threatened, manipulated and cajoled. Threats extend to my life and the life of my wife, by the government through my counsel, including Mr. Gleeson, on multiple occasions up to and including the hearing held on June 22, 2022 and July 5, 2022 via email. I have been threatened with her life repeatedly over this entire process that if I did not plead guilty and continue to sentencing she was "gone" so to speak. This has continued right up to and including the plea time with Mr. Gleeson who repeated these threats. Additionally, this further continued with and through Mr. Gleeson, on a regular basis, up to and including the hearing on June 22nd. Mr. Gleeson nudged me and told me during that hearing twice that the AUSA was sending me a "message" about my wife. Mr. Gleeson made sure I got it or got the message. Mr. Gleeson also made this statement after that hearing when we spoke in the courthouse conference room. This continued on July 5, 2022 when an email was sent reiterating this. Throughout the duration of this case this has been held over my head, heart and mind and now enough is enough. This is extortion appears to be against any oath of office which may include the Constitution of the United States, and is most likely against the law and possibly a criminal act.

Continued on page two...

It is prudent and also my desire to wait until the two open motions are resolved prior to making any decisions to submit any further documents.

Mr. Gleeson submitted the stipulation and motion without my prior notice that he had received the stipulated order and without my knowledge and approval that he was submitting the stipulation to the court for approval.

I hereby request that the order allowing for a late submission of the sentencing memorandum be stayed for a period of 24 business hours following the resolution of the two motions in the courts hands.

I hereby certify that I electronically filed the foregoing document with the Clerk of the court.

Respectfully,

*Joseph DuMouchelle*

Joseph DuMouchelle, Defendant